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ATTORNEYS FOR GENESEE STAMPING AND FABRICATING, INC.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In Re:

SUPERIOR AIR PARTS, INC.	§	
	§	Case No. 08-36705-BJH-11
	§	
	§	Chapter 11
	§	
Debtor.	§	

**MOTION OF GENESEE STAMPING AND FABRICATING, INC. FOR ALLOWANCE
AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM
UNDER 11 U.S.C. § 503(b)(9)**

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT THE EARLE CABELL BUILDING, 110 COMMERCE STREET, ROOM 1254, DALLAS, TEXAS 75242 BEFORE CLOSE OF BUSINESS ON JULY 10, 2009 WHICH IS TWENTY (20) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

NOW COMES Genesee Stamping and Fabricating, Inc. ("Movant"), and files this its Motion for Allowance and Payment of Administrative Expense Claim Under 11 U.S.C. § 503(b)(9), and for cause would respectfully show the Court the as follows:

1. On December 31, 2008 (the "Commencement Date"), Superior Air Parts, Inc. (the "Debtor"), filed a voluntary petition for relief under chapter 11 of Title 11 of the United States Code (the "Code").

2. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334.

3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

4. Venue of the Debtor's case and this Motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

5. Within the 20 days before the Commencement Date, Claimant supplied goods to the Debtor in the ordinary course of business which were received by the Debtor, and for which Claimant has not been paid. The value of the goods delivered to Debtor \$21,026.16 as of the Commencement Date (the "Administrative Expense Claim"). The invoice attached hereto as **Exhibit "A"** summarize (1) the goods provided by Claimant to Debtor, (2) the invoice number underlying the Administrative Expense Claim, and (3) the invoice amount. The bill of lading demonstrating delivery is attached as **Exhibit "B"**.

6. Section 503(b)(9) of the Code provides in pertinent part:

After notice and a hearing, there shall be allowed administrative expenses, other than claims allowed under Section 502(f) of this title, including-

(9) the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor's business.

A seller of goods to a debtor need not make a written demand on the debtor in order to assert its rights under Section 503(b)(9). See 11 U.S.C. § 546(c).

7. In this case, the goods were (1) received by the Debtor on December 22, 2008 (within 20 days of the Commencement Date) and (2) were sold to the Debtor in the ordinary course of the Debtor's business.

8. Movant is therefore entitled to an allowed administrative expense against the Chapter 11 bankruptcy estate of Debtor in the amount of \$21,026.16.

9. Attached hereto as **Exhibit "C"** is the proposed order (the "Order") granting the relief requested herein.

Prayer

Claimant respectfully requests that this Court enter the Order and grant such other and further relief as the Court deems appropriate in the circumstances.

Respectfully submitted,

PARKS HUFFMAN MCVAY SHEPARD & WELLS,
a professional corporation

By: /s/ Robert P. Shepard

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COUNSEL FOR GENESEE STAMPING AND FABRICATING,
INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served either *electronically* or by *first class mail* upon those parties requesting service of notice and the parties listed on the attached Creditor Matrix, on the 19th day of June, 2009.

/s/ Robert P. Shepard
ROBERT P. SHEPARD